

IN THE U.S. DISTRICT COURT FOR THE DISTRICT OF NEW HAMPSHIRE

**Jane Doe,**

Plaintiff,

v.

Case No.

**St. Paul's School**

Defendant.

Plaintiff's Motion for Leave to Proceed Under Pseudonym

Plaintiff, by and through her undersigned counsel, respectfully moves this Court for leave to proceed under a pseudonym to protect her identity in the above-captioned action, which involves sexual abuse and harassment perpetrated upon her when she was a minor. The precise factual and legal basis for this Motion is set forth in the attached Memorandum in Support.

Respectfully submitted,

Date: May 11, 2018

/s/ Charles G. Douglas, III  
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**CERTIFICATE OF SERVICE**

I hereby certify on this 11<sup>th</sup> day of May, 2018, a copy of the foregoing Motion to Proceed Anonymously, Memorandum in Support thereof, and Proposed Order will be served on Defendant along with the Complaint initiating this action.

/s/ Charles G. Douglas, III  
Charles G. Douglas, III